



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

NOV 10 1978

FCPF:NK
Docket No. 70-1201
SNM-1168

Babcock & Wilcox Company
Commercial Nuclear Fuel Plant
ATTN: Mr. M. A. Glora, Manager
Safety, Licensing, and Safeguards
P. O. Box 1260
Lynchburg, Virginia 24505

Gentlemen:

We have reviewed your emergency plans submitted with your letter dated July 26, 1978. Additional information (see enclosure) is necessary to show the plan meets the requirements of 10 CFR 50, Appendix E.

In order to meet our schedule for completion of the review of your emergency plans, your response to the requested additional information should be received within 45 days after the date of this letter.

Sincerely,

A handwritten signature in cursive script, appearing to read "W. T. Crow".

W. T. Crow, Section Leader
Uranium Fuel Fabrication Section
Division of Fuel Cycle and
Material Safety

Enclosure:
As stated

7812180066

ENCLOSURE

COMMENTS ON BABCOCK & WILCOX
COMMERCIAL NUCLEAR FUEL PLANT (CNFP) AMENDMENT APPLICATION
DOCKET NO. 70-1201, DATED JULY 26, 1978

1. Page 3 - (a) The plan should specify that off-site personnel be directed to assume an alert condition when plant emergencies occur that require notification of the nature and extent of an accident.

(b) Justification should be provided in the plan for not considering general emergencies. Regulatory Position C.1 (Regulatory Guide 3.42) requires the licensee to justify the reason for determining the parts of the guide that are not necessary.

(c) A section should be included on the "Spectrum of Postulated Accidents" (Regulatory Guide 3.42).
2. Page 4 - The emergency organization is not adequately described.
 - (a) To whom are emergencies reported?
 - (b) How is the emergency class established?
 - (c) Do the key personnel, directing an emergency operation, have a central location from which the emergency plan is carried out? If so, where is it located?
 - (d) What are the functions of CNFP Security? Traffic control is apparently a function of the Evacuation Officer and the CNFP security guard maintains liaison with NNFD Security.
 - (e) Authorities and responsibilities of key individuals and groups should be delineated for all types of emergencies. The communications links established for notifying, alerting, and mobilizing emergency personnel should be identified.
 - (f) Who has authority to shut down the facility, should it become necessary?
 - (g) What are "runners?" A section on definitions should be included that defines terms unique to your facility or are given connotations that differ from normally accepted usage.

3. Page 5 - (a) What is the composition of the fire brigade? To whom does it normally report (e.g., is there a separate fire department at the CNFP)?

(b) Assignment should be included for communications responsibility during an emergency for both day and backshifts. Methods available for communication between emergency team members, members and other employees, and between members and outside support agencies should be specified.
4. Page 6 - (a) How is the "senior individual present" during backshifts designated as having responsibility for implementing the emergency plan? What are his authority and responsibility for declaring an emergency? What emergency support personnel are available on site and away from the site to carry out the plan during backshift hours?

(b) The specific emergency measures should be identified for each emergency class and related to action levels or criteria that specify when the measures are to be implemented (R.G. 3.42, Section 6).
5. Page 8 - (a) Describe the communications steps taken to alert or activate emergency personnel under each class of emergency. In particular, action levels for notification of off-site agencies should be described.

(b) The details of assessment functions should be incorporated in explicit implementing procedures of each emergency classification (R.G. 3.42, Section 6.2).
6. Page 10 - What is the distance from the CNFP fuel fabrication facility to the NNFD area being considered as a personnel alternate evacuation area? An alternate evacuation area should be conveniently located for the rapid assembly and accounting of personnel. Its location should be referenced in relation to the prevailing wind direction and evacuation routes.
7. Page 12 - (a) Does either the Virginia Office of Emergency Services or the Virginia State Department of Health, Bureau of Radiological Health, have geophysical phenomena monitors? The location of off-site monitors for the measurement of geophysical phenomena should be specified.

- (b) Provide clarification on the availability of CNFP medical services or dependence on the NNFD for medical facilities.
- 8. Page 13 - (a) What is the frequency of periodic training of first aid and medical support personnel?
 - (b) Documentation should be provided of all training sessions, drills, and exercises.
 - (c) The requirement for a documented evaluation of the drills and exercises, including corrective actions taken, shall be incorporated in the Emergency Plan.
- 9. Page 14 - (a) Provision should be made for reviewing and updating all written agreements at least every two years. It should be noted that your agreement with the Lynchburg General Hospital is dated March 18, 1975.
 - (b) The Emergency Plan should include a section on "Recovery" which describes the general plans, including criteria for re-entry, recovery, and for restoring the plant to a safe operating condition. Deficiencies identified in the investigation of the incident shall be resolved prior to resumption of operations.
- 10. Appendices - (a) Appendix 4 should include a map(s), drawn to suitable scale, of all areas associated with the Emergency Plan (e.g., NNFD, LRC, alternate evacuation areas, NNFD Security Office). It should include the relative locations of all emergency support facilities (e.g., Guard Station) with respect to the areas at the CNFP handling SNM.
 - (b) Item 3.b. in Appendix 6 should be clarified. As stated, the whole body dose would apply only to personnel no older than 20.4 years of age to meet the specified requirement for exposure to no more than 12 rem. How is the exposure limit applied to older rescue personnel?
 - (c) Appendix 7 should contain the most recent address of the Region II, Office of Inspection & Enforcement, 101 Marietta Street, Suite 3100, Atlanta, Georgia, 30303. The phone number of the General Agent, C&O Railroad, should be included in the plan (the phone numbers of all other required contacts are included).

- (d) An appendix should be added that contains plots of calculated time/distance/dose for the most serious postulated design basis accident.